

February 14, 2014

New Bedford Conservation Commission 133 William Street New Bedford, MA 02740 FEB 2 a alla

RE:

NSTAR Electric Right-of-Way (ROW) Maintenance Activities

Dear Commission Members,

NSTAR Electric is submitting this letter to inform you that vegetation maintenance work will be performed on Right-of-Way (ROW) within your town. This work may take place in close proximity to and/or within wetland resource areas. This project is being conducted under the Utility Maintenance Exemption of the WPA under M.G.L. Chapter 131, Section 40, and 310CMR 10.02(2)(a)(2) which provide for the following exemption.

"activities conducted to maintain, repair or replace, but not substantially change or enlarge an existing and lawfully located structure or facility used in the service of the public and used to provide electric, gas, water, telephone, telegraph and other communication services, provided said work utilizes the best practical measures to avoid or minimize impacts to wetland resource areas outside the footprint of said structure or facility."

NSTAR is sending this notification to inform your commission of the work and provide a contact if you seek more information. In addition, to the activities described below, enclosed is an information card, locus map of the projected maintenance area, and resource area mapping.

Project:

ROW 143 Utility Maintenance – Vegetation Management

Purpose:

To ensure clearance of electrical lines from vegetation for safety and to allow emergency

access to the system.

Location:

See attached maps.

Project Description:

Vegetation management on transmission & distribution Rights-of-Way is an ongoing activity and in 2014, NSTAR will be maintaining the vegetation on ROWs within your town. To provide worker safety and ensure electric service reliability, the vegetation must be maintained in accordance with company Vegetation Management Plan (VMP). Vegetation that hinders emergency restoration operations also must be controlled.

NSTAR's Vegetation Management Program (VMP) uses the Wire Zone-Border Zone method to maintain our transmission & distribution corridor. This method includes the creation of two separate growth zones (please see enclosed information for more detail).

The Wire Zone is the area directly under transmission & distribution lines, extending ten feet outside the wires. In the Wire Zone, trees and brush that have a mature height of 3 feet or greater are removed, which will promote the future growth of native, low growing plant communities.

The Border Zone is the area ten feet from the edge of the wires to the ROW easement edge. In the Border Zone, trees and brush that have a mature height of 15 feet or greater are removed, which will promote the future growth of native, low growing trees and shrubs.

Outside the ROW easement, trees that have the potential to damage transmission & distribution wires and/or towers will be pruned or removed with permission of the property owner.

Environmental Protection Measures:

As this work may take place within a buffer zone and/or wetland resource areas, NSTAR requires this work to be performed using NSTAR's standard best management practices to prevent permanent impact to the environment. These best management practices are listed below.

- Vegetation control activities are managed by degreed arborists holding certifications in Massachusetts and the International Society of Arboriculture.
- Vegetation Management activities are performed under a Vegetation Management Plan (VMP) and Yearly Operating Plan (YOP) submitted to the Massachusetts Department of Agricultural Resources. In addition, Best Management Practices used during these activities are based on standard requirements received from the Natural Heritage and Endangered Species Program (NHESP) under the Massachusetts Endangered Species Act (MESA).
- Unless safety concerns dictate otherwise and/or where feasible, the following general practices are used when working in and around wetlands:
 - o Vehicle traffic will remain on ROW access roadways as much as possible.
 - Heavy equipment will remain outside of wetlands with visibly saturated areas to minimize rutting.
 - Vegetation management in wetlands with visibly saturated areas will be performed by hand, on swamp matting, or using low pressure equipment.
 - Low growing shrubs, such as winterberry or high bush blueberry will remain in the
 wetlands. (Note: these species may be trimmed or mowed, but their root system will
 not be destroyed or grubbed out).
 - Wood will be removed and stacked outside of areas containing standing water.
 - o No refueling of equipment will take place within 100 feet of wetlands.

Proposed Schedule:

The proposed maintenance work is scheduled to take place during 2014.

If the Commission should have any questions or would like to meet regarding this letter or the scheduled maintenance activities, please call Denise Bartone at 781-441-8174. Thank you for your consideration in this matter.

Respectfully,

Denise M. Bartone Sr. Environmental Engineer NSTAR Environmental Affairs